

# EXHIBIT “A”

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Englewood Cliffs, New Jersey 07632  
Tel: 201-394-3402  
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*Attorney for Plaintiffs*

HONGLIANG CHEN,  
Plaintiff,  
v.  
THEODORE STARKE, BAY SHIPPERS  
LLC, JOHN DOES (fictitious name) and  
ABC CORP. (fictitious name)  
Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: UNION COUNTY

**SUMMONS**

CIVIL ACTION

Docket No.: UNN-L-89-21

From the State of New Jersey to the Defendant(s) Named Above,

The plaintiff(s), named above, has (have) filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services offices in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated: April 1, 2021

/s/ Michelle M. Smith

Michelle M. Smith  
Clerk of the Superior Court

NOTE: The Case Information Statement is available at [www.njcourts.com](http://www.njcourts.com)

Name(s) & Address(es) of Defendant(s) to be Served:

**Theodore Starke, 3946 Elson Road, Brookhaven, PA 19015**

**Bay Shippers LLC, 4035 Jimbo Drive, Burton, MI 48529**

## **Directory of Superior Court Deputy Clerk's Office County Lawyer Referral and Legal Services Offices**

**ATLANTIC COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division, Direct Filing  
1201 Bacharach Blvd., First Fl.  
Atlantic City, NJ 08401

**LAWYER REFERRAL**

(609) 345-3444  
**LEGAL SERVICES**  
(609) 348-4200

**BERGEN COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division, Room 115  
Justice Center, 10 Main St.  
Hackensack, NJ 07601

**LAWYER REFERRAL**

(201) 488-0044  
**LEGAL SERVICES**  
(201) 487-2166

**BURLINGTON COUNTY:**

Deputy Clerk of the Superior Court  
Central Processing Office  
Attn: Judicial Intake  
First Fl., Courts Facility  
49 Rancocas Rd.  
Mt. Holly, NJ 08060

**LAWYER REFERRAL**

(609) 261-4862  
**LEGAL SERVICES**  
(800) 496-4570

**CAMDEN COUNTY:**

Deputy Clerk of the Superior Court  
Civil Processing Office  
Hall of Justice  
1st Fl., Suite 150  
101 South 5th Street  
Camden, NJ 08103

**LAWYER REFERRAL**

(856) 964-4520  
**LEGAL SERVICES**  
(856) 964-2010

**CAPE MAY COUNTY:**

Deputy Clerk of the Superior Court  
9 N. Main Street  
Cape May Court House, NJ 08210

**LAWYER REFERRAL**

(609) 463-0313  
**LAWYER SERVICES**  
(609) 465-3001

**CUMBERLAND COUNTY:**

Deputy Clerk of the Superior Court  
Civil Case Management Office  
60 West Broad Street  
P.O. Box 10  
Bridgeton, NJ 08302

**LAWYER REFERRAL**

(856) 696-5550  
**LEGAL SERVICES**  
(856) 691-0494

**ESSEX COUNTY:**

Deputy Clerk of the Superior Court  
Civil Customer Service  
Hall of Records, Room 201  
465 Dr. Martin Luther King Jr. Blvd.  
Newark, NJ 07012

**LAWYER REFERRAL**

(973) 622-6204  
**LEGAL SERVICES**  
(973) 624-4500

**GLOUCESTER COUNTY:**

Deputy Clerk of the Superior Court  
Civil Case Management Office  
Attn: Intake  
First Fl., Court House  
1 North Broad Street  
Woodbury, NJ 08096

**LAWYER REFERRAL**

(856) 848-4589  
**LEGAL SERVICES**  
(856) 848-5360

**HUDSON COUNTY:**

Deputy Clerk of the Superior Court  
Superior Court, Civil Records Dept.  
Brennan Court House – 1st Floor  
583 Newark Ave.

**LAWYER REFERRAL**

(201) 798-2727  
**LEGAL SERVICES**  
(201) 792-6363

Jersey City, NJ 07306

**HUNTERDON COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division  
65 Park Avenue  
Flemington, NJ 08822

**LAWYER REFERRAL**

(908) 735-2611  
**LEGAL SERVICES**  
(908) 782-7979

**MERCER COUNTY:**

Deputy Clerk of the Superior Court  
Local Filing Office, Courthouse  
175 S. Broad Street, P.O. Box 8068  
Trenton, NJ 08650

**LAWYER REFERRAL**

(609) 585-6200  
**LAWYER SERVICES**  
(609) 695-6249

**MIDDLESEX COUNTY:**

Deputy Clerk of the Superior Court,  
Middlesex Vicinage  
2nd Floor – Tower  
56 Paterson Street, P.O. Box 2633  
New Brunswick, NJ 08903-2633

**LAWYER REFERRAL**

(732) 828-0053  
**LEGAL SERVICES**  
(732) 249-7600

**MONMOUTH COUNTY:**

Deputy Clerk of the Superior Court  
Court House  
P.O. Box 1296  
Freehold, NJ 07728-1269

**LAWYER REFERRAL**

(732) 431-5544  
**LEGAL SERVICES**  
(732) 866-0020

**MORRIS COUNTY:**

Morris County Courthouse  
Civil Division  
Washington and Court Streets  
P.O. Box 910  
Morristown, NJ 07963-0910

**LAWYER REFERRAL**

(973) 267-5882  
**LEGAL SERVICES**  
(973) 285-6911

**OCEAN COUNTY:**

Deputy Clerk of the Superior Court  
118 Washington Street, Room 121  
P.O. Box 2191  
Toms River, NJ 08754-2191

**LAWYER REFERRAL**

(732) 240-3666  
**LEGAL SERVICES**  
(732) 341-2727

**PASSAIC COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division  
Court House  
77 Hamilton Street  
Paterson, NJ 07505

LAWYER REFERRAL  
(973) 278-9223  
LEGAL SERVICES  
(973) 523-2900

**SALEM COUNTY:**

Deputy Clerk of the Superior Court  
Attn: Civil Case Management Office  
92 Market Street  
Salem, NJ 08079

LAWYER REFERRAL  
(856) 935-5629  
LEGAL SERVICES  
(856) 451-0003

**SOMERSET COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division  
P.O. Box 3000  
40 North Bridge Street  
Somerville, NJ 08876

LAWYER REFERRAL  
(908) 685-2323  
LEGAL SERVICES  
(908) 231-0840

**SUSSEX COUNTY:**

Deputy Clerk of the Superior Court  
Sussex County Judicial Center  
43-47 High Street  
Newton, NJ 07860

LEGAL REFERRAL  
(973) 267-5882  
LEGAL SERVICES  
(973) 383-7400

**UNION COUNTY:**

Deputy Clerk of the Superior Court  
1st Fl., Court House  
2 Broad Street  
Elizabeth, NJ 07207-6073

LAWYER REFERRAL  
(908) 353-4715  
LEGAL SERVICES  
(908) 354-4340

**WARREN COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division Office  
Court House  
413 Second Street  
Belvidere, NJ 07823-1500

LAWYER REFERRAL  
(973) 267-5882  
LEGAL SERVICES  
(908) 475-2010

Sung H. Jang, Esq.  
Attorney ID No. 049542011  
SJ Law  
460 Sylvan Ave., Suite 102  
Englewood Cliffs, New Jersey 07632  
Tel: (201) 394-3402 / Fax: (201) 903-3892

HONGLIANG CHEN,

Plaintiff,

v.

THEODORE STARKE, BAY SHIPPERS LLC,  
JOHN DOES (fictitious name) and ABC  
CORP. (fictitious name)

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: UNION COUNTY

DOCKET NO.: UNN-L-89-2 |

CIVIL ACTION

**COMPLAINT & JURY DEMAND**

Plaintiff, HONGLIANG CHEN, by way of Complaint against all of the above captioned Defendants states:

**PARTIES**

1. Plaintiff, HONGLIANG CHEN is an individual residing at 22415 59<sup>th</sup> Ave., Apt 2, Bayside, NY 11364.
2. Defendant, THEODORE STARKE, is an individual residing at 3946 Elson Road, Brookhaven, PA 19015.
3. Defendant BAY SHIPPERS LLC is a business with its principal place of business located at 4035 Jimbo Drive, Burton, MI 48529.
4. Defendants, JOHN DOES and ABC CORP. are fictitious parties.

**FIRST COUNT**

1. On or about April 4, 2019, Plaintiff, HONGLIANG CHEN was the operator of a motor vehicle traveling on New Jersey Turnpike, Interchange 13, Elizabeth, New Jersey.

2. At said time and place, Defendant, THEODORE STARKE, was the operator of a motor vehicle that was traveling New Jersey Turnpike, Interchange 13, Elizabeth, New Jersey.

3. At all relevant times, due to the negligence of Defendant, THEODORE STARKE, the vehicle operated by Defendant, THEODORE STARKE struck the plaintiff's vehicle.

4. As a result of Defendant, THEODORE STARKE's negligence, Plaintiff, HONGLIANG CHEN was violently tossed about, suffered serious permanent personal injuries, permanent disfigurement, lost wages, medical expenses, past, present and future pain and suffering and temporary disability and permanent physical disability, and property damage.

WHEREFORE, Plaintiffs demand judgment against Defendant, THEODORE STARKE for compensatory damages, interest, costs of suit, and any such other and further relief as the court deems just and equitable.

#### SECOND COUNT

1. Plaintiffs repeat and reallege all of the allegations of the First Count of the Complaint as if set forth at length herein.

2. At all relevant times, Defendant, THEODORE STARKE acted negligently in failing to make proper observations and otherwise breached a duty of care to Plaintiffs, by driving his motor vehicle in a negligent fashion and striking Plaintiffs' motor vehicle.

3. As a result of Defendant, THEODORE STARKE's negligence, Plaintiffs were violently tossed about, suffered serious permanent personal injuries, permanent disfigurement, lost wages, medical expenses, past present and future, pain and suffering and temporary disability and permanent physical disability, and property damage.

WHEREFORE, Plaintiffs demand judgment against Defendant, THEODORE STARKE for compensatory damages, interest, costs of suit and any such other and further relief as the court deems just and equitable.

**THIRD COUNT**

1. Plaintiffs repeat and reallege all of the allegations of the First & Second Counts of the Complaint as if set forth at length herein.
2. At said time and place of the accident, Defendant, BAY SHIPPERS LLC, was the owner of a motor vehicle that was being operated by defendant THEODORE STARKE.
3. At the aforesaid time and place, defendant THEODORE STARKE was operating the defendant's motor vehicle with the knowledge, permission and or consent of defendant owner BAY SHIPPERS LLC.
4. At the aforesaid time and place, defendant, THEODORE STARKE, was operating the aforementioned defendant motor vehicle as an agent, servant and/or employee of defendant owner/co-owner, BAY SHIPPERS LLC, or held such other relationship of agency with said defendant owner/co-owner that said defendant owner/co-owner is vicariously liable to plaintiff.
5. At the aforesaid time and place, defendant, BAY SHIPPERS LLC was the owner of the motor vehicle with the license plate MI RB39978, and allowed Defendant THEODORE STARKE to drive said vehicle while knowing or while should have known that Defendant THEODORE STARKE was a careless and reckless driver.
6. Defendant, BAY SHIPPERS LLC is therefore liable under the legal theory of Respondeat Superior and Negligent Entrustment.

WHEREFORE, Plaintiffs demand judgment against Defendant, BAY SHIPPERS LLC for compensatory damages, interest, costs of suit, and any such other and further relief as the court deems just and equitable

**FOURTH COUNT**

1. Plaintiffs repeat and reallege all of the allegations of the First , Second and Third Counts of the Complaint as if set forth at length herein.
2. At all relevant times, Defendant, THEODORE STARKE operated his vehicle in a manner that violated one or more statutes regulating the operation of a motor vehicle.
3. As a result of Defendant, THEODORE STARKE's negligence, Plaintiffs were violently tossed about, suffered serious permanent personal injuries, permanent disfigurement, lost wages, medical expenses, past present and future, pain and suffering and temporary disability and permanent physical disability, and property damage.
4. Due to such violation(s), Defendant committed an act of negligence per se on the basis of statutory violation and is liable under Negligence Per Se.

WHEREFORE, Plaintiffs demand judgment against Defendant, THEODORE STARKE for compensatory damages, interest, costs of suit and any such other and further relief as the court deems just and equitable.

demand judgment against Defendant, THEODORE STARKE for punitive damages.

FIFTH COUNT

1. Plaintiffs repeat and reallege all of the allegations of the First, Second, Third & Fourth Counts of the Complaint and makes same a part thereof.

2. At all relevant times, Defendants, JOHN DOES and ABC CORP., are fictitious names for unknown persons and/or business entities and/or corporations who may be liable for the injuries to Plaintiffs.

WHEREFORE, Plaintiffs demand judgment against Defendants, JOHN DOES and ABC CORP., said names being fictitious, for compensatory damages, interest, costs of suit and any other and further relief as the court deems just and equitable.

Dated: January 10, 2021

BY: /s/ Sung Jang  
SUNG H. JANG, ESQ.  
SJ LAW  
*Attorneys for Plaintiff*

CERTIFICATION

I hereby certify that the matter in controversy is not the subject of any other action or arbitration proceeding, now or contemplated, that no other parties should be joined in this action.

Dated: January 10, 2021

BY: /s/ Sung Jang  
SUNG H. JANG  
SJ LAW  
*Attorneys for Plaintiff*

**TRIAL COUNSEL DESIGNATIONS**

Pursuant to R. 4:25-4 of the Rules Governing the Courts of the State of New Jersey, Sung H. Jang, Esq., is hereby designated as trial counsel in the above captioned matter.

Dated: January 10, 2021

BY: /s/ Sung Jang  
SUNG H. JANG  
SJ LAW  
*Attorneys for Plaintiff*

**JURY DEMAND**

Plaintiffs hereby demands a trial by jury as to all issues so triable.

Dated: January 10, 2021

BY: /s/ Sung Jang  
SUNG H. JANG  
SJ LAW  
*Attorneys for Plaintiff*

## Civil Case Information Statement

### Case Details: UNION | Civil Part Docket# L-000089-21

Case Caption: CHEN HONGLIANG VS STARKE THEODORE	Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-VERBAL THRESHOLD)
Case Initiation Date: 01/10/2021	Document Type: NJ eCourts Case Initiation Confirmation
Attorney Name: SUNG H JANG	Jury Demand: YES - 12 JURORS
Firm Name: SJ LAW	Is this a professional malpractice case? NO
Address: 460 SYLVAN AVE STE 203 ENGLEWOOD CLIFFS NJ 07632	Related cases pending: NO
Phone: 2019033892	If yes, list docket numbers:
Name of Party: PLAINTIFF : Chen, Hongliang	Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO
Name of Defendant's Primary Insurance Company (if known): Unknown	Are sexual abuse claims alleged by: Hongliang Chen? NO

### THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

01/10/2021  
Dated

/s/ SUNG H JANG  
Signed

UNION COUNTY SUPERIOR COURT  
2 BROAD STREET  
CIVIL DIVISION  
ELIZABETH NJ 07207

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (908) 787-1650  
COURT HOURS 8:30 AM - 4:30 PM

DATE: JANUARY 11, 2021  
RE: CHEN HONGLIANG VS STARKE THEODORE  
DOCKET: UNN L -000089 21

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS  
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON ALAN G. LESNEWICH

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001  
AT: (908) 787-1650 EXT 21493.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A  
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.

PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE  
WITH R.4:5A-2.

ATTENTION:

ATT: SUNG H. JANG  
SJ LAW  
460 SYLVAN AVE  
STE 203  
ENGLEWOOD CLIFFS NJ 07632

E COURTS